

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION III

841 Chestnut Building
Philadelphia, Pennsylvania 19107

Request for a Ceiling Increase/12-Month Exemption
for the Belfield Avenue Site

SUBJECT: Philadelphia, Philadelphia County, Pennsylvania DATE: SEP 5, 1988

FROM: James M. Seigler, Regional Administrator (3RA00)

TO: Dr. J. Winston Porter, Assistant Administrator
Solid Waste and Emergency Response (WH-562A)

ISSUE

The attached CERCLA Funding Request pertains to the Belfield Avenue Site in Philadelphia, Philadelphia County, Pennsylvania.

Removal operations are necessary to eliminate the threat to public health and the environment posed by the flammable and toxic materials present at the Belfield Avenue Site.

Pursuant to Section 104 (e) of the Superfund Amendments Reauthorization Act (SARA) of 1986, and the Delegation of Authority 14-1-A (9-13-87), which authorized the Regional Administrator to approve CERCLA Removal Actions with a total cost of less than \$2,000,000 and approve exemptions to the one year limit, I have approved additional funding in the amount of \$300,000, \$250,000 of which is for extramural costs, to complete the removal operations and an exemption to the 12-month statutory limit. This increases the project ceiling from \$1,026,000 to \$1,326,000.

The additional funding of \$300,000 is for use during fiscal year 1989. There are sufficient funds remaining in the current ceiling to allow work to continue through the end of fiscal year 1988.

Attachments

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for the Belfield Ave Site

SUBJECT: Philadelphia, Philadelphia County, Pennsylvania DATE: SEP 01 1988

FROM: Phil Younis, On-Scene Coordinator
Removal Response Section (3HW25)

TO: James M. Seif
Regional Administrator (3RA00)

THRU Stephen R. Wassersug, Director
Hazardous Waste Management Division (3HW00)

I. ISSUE

This is a request for additional funding and an exemption from the 12-month statutory limit to continue and complete removal operations at the Belfield Avenue Site, Philadelphia, Philadelphia County, Pennsylvania. Additional funds are necessary to perform on-site treatment of wastes, and for the subsequent disposal of these wastes. A ceiling increase of \$300,000, of which \$250,000 is for extramural costs, for a new total of \$1,326,000 is being requested to continue removal operations at the Belfield Avenue Site.

II. BACKGROUND

The Visual Packaging Company was a chemical repackaging and specialty chemical blender located at 5230 Belfield Avenue, Philadelphia, Pennsylvania. The facility consisted of a large, three story building of approximately 120,000 square feet. The building housed Visual Packaging and several small businesses which rented space from Mr. Bob Vernon, owner of the building and of Visual Packaging. The small businesses were involved in light manufacturing of rugs, furniture, and other wood products. The products packaged and blended at Visual Packaging included: hand soap, gasfinder, waterfinder, zinc oxide products, methanol blends, brake fluid, and isopropyl alcohol. Raw materials for the blending were stored in six (6) 1000-gallon tanks located in the Visual Packaging work area and in one 7000-gallon underground tank.

The area surrounding the site is residential in nature, with automobile dealerships located along one side of the building and across the street from the facility. A SEPTA train station is located directly behind the facility. The nearest residence is approximately one block from the facility.

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On July 14, 1987, the Visual Packaging Co. building was damaged by explosions followed by fire. The cause of the blast was later determined by the Fire Marshals' office to be a case of arson. Effects of the blasts on the building included shattered glass, blown out brick and concrete walls, collapsed roof, and general fire damage to portions of the interior and stored materials.

At the request of the Philadelphia Fire Department (PFD), EPA, accompanied by Technical Assistance Team Staff, responded to the emergency to assist PFD officials due to the presence of hazardous materials. Known flammable, combustible, and highly toxic materials were observed in the building during this assessment.

On July 24, 1987 EPA Enforcement, OSHA, and TAT made another assessment of the building, and it was determined that the wastes present were hazardous in nature, and the OSC determined that a potential threat to public health was present.

On August 24, 1987, a request for \$1,026,000 was approved, and emergency removal actions began.

During the subsequent removal operations over 300 drums and other containers were recovered from the damaged building. These materials were then sampled and staged within the structure remaining at Belfield Avenue. These wastes are currently staged on-site with 24 hour security and await disposal.

Analysis of the samples taken from the wastes show that over 90 percent of the wastes contain pentachlorophenol (PCP) in concentrations ranging from several parts per billion to several thousand parts per million. PCP is considered a dioxin material because dioxin is a contaminant in PCP and a combustion product of PCP. No disposal can be arranged for a material contaminated with PCP due to the chance of dioxin formation during a fire, or dioxin contamination in the PCP.

It is therefore necessary to treat the wastes to remove the PCP contamination before disposal acceptance can be secured and disposal operations can begin.

III. CRITERIA FOR EXEMPTION FROM STATUTORY LIMITS

Conditions at the Belfield Avenue Site meet the exemption criteria in CERCLA 104 (c), as amended by SARA as follows:

A. There is an immediate risk to public health, welfare, or the environment.

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Currently, there are over 300 drums of highly flammable and toxic materials staged within an arson-prone building which has no physical access controls. This facility is located in northern Philadelphia, 50 feet from a SEPTA train station and bus stop, and less than 100 yards from the nearest residence.

B. Continued response actions are immediately required to prevent, limit, or mitigate an emergency.

Response actions at the Belfield Avenue Site must continue beyond the 12-month statutory limit to remove the staged wastes from the site.

The threat on-site consists of flammable and toxic materials staged in fire damaged containers within a building which lacks physical security. The building has a history of arson, including one fire set in July, 1988. The burning of the wastes could produce the highly toxic dioxin, which would present a great danger to human health and the environment.

C. Assistance will not otherwise be provided on a timely basis.

As of this date, no potential responsible parties have been identified as owners of the on-site wastes. The owner of the building has refused responsibility for these wastes, because they were abandoned by a former tenant. Due to the very specific nature of the required on-site waste treatment, PADER and the City of Philadelphia lack the technical resources to perform the task. The scope of work for this removal action is expected to be completed by December 31, 1988.

IV. PROPOSED ACTIONS

The requested funds will be used in four phases to treat and dispose of the on-site wastes. Phase one and two will consist of the treatment phase, which is to be started during fiscal year 1988 and completed during fiscal year 1989. Phase one and two will have a total cost of approximately \$250,000. Phase three will consist of final analytical work and waste stream generation, and is anticipated to cost \$100,000. Phase four will consist of final transportation and disposal of the wastes and is anticipated to cost approximately \$200,000.

The proposed continued removal actions address the protection of the public health and the environment by the removal of the highly toxic wastes from public access and close proximity. This scope of work does not interfere with any long-term remedial cleanup actions, because no remedial actions are anticipated at the site.

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V. SUMMARY OF COSTS

	CURRENT CEILING	PROPOSED CEILING
ERCS	\$810,000	1,060,000
TAT	100,000	100,000
EPA (Direct)	38,000	55,000
EPA HQ (Indirect)	78,000	111,000
TOTAL	1,026,000	1,326,000

VI. REGIONAL RECOMMENDATION

Because conditions at the Belfield Avenue Site meet the criteria set forth in Section 300.65 of the National Contingency Plan, and also meet the criteria in CERCLA Section 104 (a) to be exempt from the 12-month statutory limit, I recommend your approval of this Additional Funding Request/Request for Exemption from the 12-Month Statutory Limit. The estimated costs are \$300,000, of which \$250,000 is for extramural costs, and the new project ceiling will be \$1,326,000.

You may indicate your approval or disapproval by signing below.

APPROVAL

DATE

9/1/88

DISAPPROVAL

DATE

200011